REMARKS

Claims 1-20 are pending in this application. Claims 1, 14, 17, and 20 are independent. By this response, claims 1-20 are amended. No new matter has been introduced.

Specification and Claims

The specification has been amended to correct a minor typographical error.

Subject-Matter Rejections

The rejection of claim 17 under 35 U.S.C. § 101 is moot in view of the amendments to claim 17.

35 U.S.C. § 112, Sixth Paragraph

The Office action provides that the features "input operation part", "storage part", moving image file processing part", "reproduction information file processing part", "operation managing part", "data processing part", "file analyzing part", and "multiplex file processing part" invoke 35 U.S.C. § 112, sixth paragraph. The applicants respectfully disagree that these features invoke § 112, sixth paragraph. The MPEP provides that "a claim element that does not include the phrase 'means for' or 'step for' will not be considered to invoke 35 U.S.C. 112, sixth paragraph." (*See* MPEP 2181.) The recited features do not include the phrase "means for" or "step for". Therefore, the recited features and not to be construed as invoking 35 U.S.C. § 112, sixth paragraph.

Art-Based Rejections

Independent Claim 1

Claim 1 stands rejected under 35 U.S.C. § 102(e) over Chen (U.S. Patent No. 7,046,910). The applicants respectfully traverse this rejection.

Claim 1 recites "a storage part for storing . . . a reproduction information file in which control information concerning a reproduction process, including a reproduction position of the moving file, is described". Chen does not teach or suggest this feature.

Chen describes a technique for reading an MPEG transport stream. (*See* Chen, col. 7, ll.24-25.) In this technique, the presence of a picture header is determined. (*See id.*) If no picture header is detected, the transport stream is bypassed. (*See* Chen, col. 7, ll. 26-27.) Otherwise, the transport stream is stored. (*See* Chen, col. 7, ll.28-29.)

The Office action equates Chen's picture header with "a reproduction information file in which control information concerning a reproduction process, including a reproduction position of the moving file, is described". However, Chen's picture header does not include any control information concerning any reproduction process. Nor does Chen's picture header include a

reproduction position of a moving file. To the contrary, Chen's picture header merely indicates whether or not a transport stream is to be stored.

For at least these reasons, the applicants respectfully request that the § 102 rejections of independent claim 1 and its dependent claims be withdrawn.

Claim 1 also recites "a basic frame reconstitution part for reconstituting basic frame including all data of information necessary for decoding one frame at an arbitrary position". Chen does not teach or suggest this feature. For at least this reason, the applicants respectfully request that the § 102 rejections of independent claim 1 and its dependent claims be withdrawn.

Independent Claim 14

Claim 14 stands rejected under § 102(e) over Chen. The applicants respectfully traverse this rejection.

Claim 14 recites "when a reproduction stop event or a reproduction information file generation command had occurred, creating a related file for performing a resume reproduction". Chen does not teach or suggest this feature.

Chen describes transcoding progressive I-slice refreshed MPEG data streams to enable trick play mode features. (*See* Chen, col. 5, ll. 56-58.) P-frames are decoded to recover I-slices in order to make up a complete I-frame. A selected P-frame in the MPEG data stream is then *replaced with the I-frame* to provide an encoded I-frame based data stream. (*See* Chen, col. 5, line 66 - col. 6, line 3, emphasis added.)

Although Chen describes replacing a selected P-frame with a complete I-frame, Chen does not teach or suggest "creating a related file for performing a resume reproduction", as recited in claim 14. Chen's Figure 2 makes it clear that the resulting I-frame is not stored apart from one or all of the P-frames (e.g., as a related file). To the contrary, Chen's resulting I-frame is to take the place of one or all of the P-frames.

For at least these reasons, the applicants respectfully request that the § 102 rejections of independent claim 14 and its dependent claims be withdrawn.

Independent Claim 17

Claim 17 stands rejected under § 102 over Chen. The applicants respectfully traverse this rejection. Claim 17 recites "searching for a reproduction processing reference file . . . according to a reproduction file name and a reproduction start time described in the reproduction information file". Chen does not teach or suggest a reproduction information file and, therefore, does not teach or suggest the recited feature. For at least this reason, the applicants respectfully request that the § 102 rejection of claim 17 be withdrawn.

Independent Claim 20

Claim 20 stands rejected under § 102(e) over Chen. The applicants respectfully traverse this rejection. Claim 20 recites "a reproduction information file in which control information concerning a reproduction process, including a reproduction position of the multiplexed data, is described". Chen does not teach or suggest this feature. Therefore, the applicants respectfully request that the § 102 rejection of claim 20 be withdrawn.

Claims 6 and 9

Claims 6 and 9 stand rejected under 35 U.S.C. § 103(a) over the combination of Chen and Matsui (U.S. Patent Application Publication US 2002/0141740). The applicants respectfully traverse these rejections.

Claims 6 and 9 depend from claim 1. Chen does not teach or suggest "a storage part for storing . . . a reproduction information file in which control information concerning a reproduction process, including a reproduction position of the moving file, is described", as recited in claim 1. Matsui is not applied in reference to this feature.

Therefore, the applicants respectfully request that the § 103 rejections of claims 6 and 9 be withdrawn.

Conclusion

The applicants respectfully request the Examiner to reconsider and withdraw all outstanding objections and rejections.

The Examiner is invited to call Hersh H. Mehta (Registration No. 62,336) at (703) 205-8090, to discuss any outstanding issue in connection with this application.

The Director is authorized to charge any fee required during the pendency of this application or to credit any overpayment to Deposit Account No. 02-2448.

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Respectfully submitted,

By_____

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